

MS4 SWPPP Application for Reauthorization

for the NPDES/SDS General Small Municipal Separate
Storm Sewer System (MS4) Permit MNR040000
reissued with an effective date of August 1, 2013
Stormwater Pollution Prevention Program (SWPPP) Document

Doc Type: Permit Application

Instructions: This application is for authorization to discharge stormwater associated with Municipal Separate Storm Sewer Systems (MS4s) under the National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Permit Program. **No fee** is required with the submittal of this application. Please refer to "Example" for detailed instructions found on the Minnesota Pollution Control Agency (MPCA) MS4 website at <http://www.pca.state.mn.us/ms4>.

Submittal: This MS4 SWPPP Application for Reauthorization form must be submitted electronically via e-mail to the MPCA at ms4permitprogram.pca@state.mn.us from the person that is duly authorized to certify this form. All questions with an asterisk (*) are required fields. All applications will be returned if required fields are not completed.

Questions: Contact Claudia Hochstein at 651-757-2881 or claudia.hochstein@state.mn.us, Dan Miller at 651-757-2246 or daniel.miller@state.mn.us, or call toll-free at 800-657-3864.

General Contact Information (*Required fields)

MS4 Owner (with ownership or operational responsibility, or control of the MS4)

*MS4 permittee name: City of Duluth *County: St Louis
(city, county, municipality, government agency or other entity)
*Mailing address: 411 West First Street Room 211
*City: Duluth *State: MN *Zip code: 55802
*Phone (including area code): (218) 730-4063 *E-mail: ckleist@duluthmn.gov

MS4 General contact (with Stormwater Pollution Prevention Program [SWPPP] implementation responsibility)

*Last name: Kleist *First name: Christopher
(department head, MS4 coordinator, consultant, etc.)
*Title: Program Coordinator
*Mailing address: 411 West First Street Room 211
*City: Duluth *State: MN *Zip code: 55802
*Phone (including area code): 218-730-4063 *E-mail: ckleist@duluthmn.gov

Preparer information (complete if SWPPP application is prepared by a party other than MS4 General contact)

Last name: _____ First name: _____
(department head, MS4 coordinator, consultant, etc.)
Title: _____
Mailing address: _____
City: _____ State: _____ Zip code: _____
Phone (including area code): _____ E-mail: _____

Verification

1. I seek to continue discharging stormwater associated with a small MS4 after the effective date of this Permit, and shall submit this MS4 SWPPP Application for Reauthorization form, in accordance with the schedule in Appendix A, Table 1, with the SWPPP document completed in accordance with the Permit (Part II.D.). ☒ Yes
2. I have read and understand the NPDES/SDS MS4 General Permit and certify that we intend to comply with all requirements of the Permit. ☒ Yes

Certification (All fields are required)

- ☒ Yes - I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

I certify that based on my inquiry of the person, or persons, who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of civil and criminal penalties.

This certification is required by Minn. Stat. §§ 7001.0070 and 7001.0540. The authorized person with overall, MS4 legal responsibility must certify the application (principal executive officer or a ranking elected official).

By typing my name in the following box, I certify the above statements to be true and correct, to the best of my knowledge, and that this information can be used for the purpose of processing my application.

Name: Chris Kleist
(This document has been electronically signed)

Title: Program Coordinator Date (mm/dd/yyyy): 07/15/2013

Mailing address: 411 West First Street Room 211

City: Duluth State: MN Zip code: 55802

Phone (including area code): 218-730-4063 E-mail: ckleist@duluthmn.gov

Note: The application will not be
processed without certification.

Stormwater Pollution Prevention Program Document

I. Partnerships: (Part II.D.1)

- A. List the **regulated small MS4(s)** with which you have established a partnership in order to satisfy one or more requirements of this Permit. Indicate which Minimum Control Measure (MCM) requirements or other program components that each partnership helps to accomplish (List all that apply). Check the box below if you currently have no established partnerships with other regulated MS4s. If you have more than five partnerships, hit the tab key after the last line to generate a new row.

☐ No partnerships with regulated small MS4s

Name and description of partnership	MCM/Other permit requirements involved
Regional Stormwater Protection Team (RSPT)	MCM 1,2,3,6

- B. If you have additional information that you would like to communicate about your partnerships with other regulated small MS4(s), provide it in the space below, or include an attachment to the SWPPP Document, with the following file naming convention: *MS4NameHere_Partnerships*.

CityofDuluth_Partnerships.pdf

II. Description of Regulatory Mechanisms: (Part II.D.2)

Illicit discharges

- A. Do you have a regulatory mechanism(s) that effectively prohibits non-stormwater discharges into your small MS4, except those non-stormwater discharges authorized under the Permit (Part III.D.3.b.)? ☐ Yes ☒ No

1. If **yes**:

- a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

☐ Ordinance ☐ Contract language
☐ Policy/Standards ☐ Permits
☐ Rules
☐ Other, explain: _____

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

Direct link:

<http://library.municode.com/index.aspx?clientId=50009> Chapter 43

☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_IDDEreg*.

2. If **no**:

Describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

We are currently in the process of updating, clarifying, and strengthening the IDDE portions of our ordinance to meet permit requirements. This process will be completed within twelve months that permit coverage is extended.

Construction site stormwater runoff control

- A. Do you have a regulatory mechanism(s) that establishes requirements for erosion and sediment controls and waste controls?
☒ Yes ☐ No

1. If **yes**:

- a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

- ☒ Ordinance ☐ Contract language
☒ Policy/Standards ☒ Permits
☐ Rules
☐ Other, explain: _____

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

<http://library.municode.com/index.aspx?clientId=50009>, Chapter 50, Article II, Section 18, subp. E

Direct link:

http://www.duluthmn.gov/engineering/spec_book/

<https://www.duluthmn.gov/engineering/permits/downloads/Erosion%20Control%20Permit%20Application%20November%202011.PDF>

- ☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention:
MS4NameHere_CSWreg.

- B. Is your regulatory mechanism at least as stringent as the MPCA general permit to Discharge Stormwater Associated with Construction Activity (as of the effective date of the MS4 Permit)? ☐ Yes ☒ No

If you answered **yes** to the above question, proceed to C.

If you answered **no** to either of the above permit requirements listed in A. or B., describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

Within twelve months that permit coverage is extended we will review and update as necessary to ensure that our inspection and review program covers all necessary aspects of appropriate sites to be at least as stringent as the MPCA CSW permit.

- C. Answer **yes** or **no** to indicate whether your regulatory mechanism(s) requires owners and operators of construction activity to develop site plans that incorporate the following erosion and sediment controls and waste controls as described in the Permit (Part III.D.4.a.(1)-(8)), and as listed below:

- | | |
|--|---|
| 1. Best Management Practices (BMPs) to minimize erosion. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 2. BMPs to minimize the discharge of sediment and other pollutants. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 3. BMPs for dewatering activities. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 4. Site inspections and records of rainfall events | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 5. BMP maintenance | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 6. Management of solid and hazardous wastes on each project site. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 7. Final stabilization upon the completion of construction activity, including the use of perennial vegetative cover on all exposed soils or other equivalent means. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 8. Criteria for the use of temporary sediment basins. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

Within twelve months that permit coverage is extended we will review and update our ordinances, permits, and inspections as necessary to ensure that we are at least as stringent as the MPCA CSW permit

Post-construction stormwater management

- A. Do you have a regulatory mechanism(s) to address post-construction stormwater management activities?

☒ Yes ☐ No

1. If **yes**:

- a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

- ☒ Ordinance ☐ Contract language
☒ Policy/Standards ☒ Permits
☐ Rules
☐ Other, explain: _____

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

Direct link:

http://www.duluthmn.gov/engineering/spec_book/

http://www.duluthmn.gov/planning/zoning_regulations/

☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_PostCSWreg*.

- B. Answer **yes** or **no** below to indicate whether you have a regulatory mechanism(s) in place that meets the following requirements as described in the Permit (Part III.D.5.a.):

1. **Site plan review:** Requirements that owners and/or operators of construction activity submit site plans with post-construction stormwater management BMPs to the permittee for review and approval, prior to start of construction activity. ☒ Yes ☐ No
2. **Conditions for post construction stormwater management:** Requires the use of any combination of BMPs, with highest preference given to Green Infrastructure techniques and practices (e.g., infiltration, evapotranspiration, reuse/harvesting, conservation design, urban forestry, green roofs, etc.), necessary to meet the following conditions on the site of a construction activity to the Maximum Extent Practicable (MEP):
 - a. For new development projects – no net increase from pre-project conditions (on an annual average basis) of: ☐ Yes ☒ No
 - 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
 - 2) Stormwater discharges of Total Suspended Solids (TSS).
 - 3) Stormwater discharges of Total Phosphorus (TP).
 - b. For redevelopment projects – a net reduction from pre-project conditions (on an annual average basis) of: ☐ Yes ☒ No
 - 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
 - 2) Stormwater discharges of TSS.
 - 3) Stormwater discharges of TP.
3. **Stormwater management limitations and exceptions:**
 - a. Limitations
 - 1) Prohibit the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) when the infiltration structural stormwater BMP will receive discharges from, or be constructed in areas: ☐ Yes ☒ No
 - a) Where industrial facilities are not authorized to infiltrate industrial stormwater under an NPDES/SDS Industrial Stormwater Permit issued by the MPCA.
 - b) Where vehicle fueling and maintenance occur.
 - c) With less than three (3) feet of separation distance from the bottom of the infiltration system to the elevation of the seasonally saturated soils or the top of bedrock.
 - d) Where high levels of contaminants in soil or groundwater will be mobilized by the infiltrating stormwater.
 - 2) Restrict the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), without higher engineering review, sufficient to provide a functioning treatment system and prevent adverse impacts to groundwater, when the infiltration device will be constructed in areas: ☒ Yes ☐ No
 - a) With predominately Hydrologic Soil Group D (clay) soils.
 - b) Within 1,000 feet up-gradient, or 100 feet down-gradient of active karst features.
 - c) Within a Drinking Water Supply Management Area (DWSMA) as defined in Minn. R. 4720.5100, subp. 13.
 - d) Where soil infiltration rates are more than 8.3 inches per hour.
 - 3) For linear projects where the lack of right-of-way precludes the installation of volume control practices that meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), the permittee's regulatory mechanism(s) may allow exceptions as described in the Permit (Part III.D.5.a(3)(b)). The permittee's regulatory mechanism(s) shall ensure that a reasonable attempt be made to obtain right-of-way during the project planning process. ☐ Yes ☒ No

4. **Mitigation provisions:** The permittee's regulatory mechanism(s) shall ensure that any stormwater discharges of TSS and/or TP not addressed on the site of the original construction activity are addressed through mitigation and, at a minimum, shall ensure the following requirements are met:
- a. Mitigation project areas are selected in the following order of preference: ☐ Yes ☒ No
 - 1) Locations that yield benefits to the same receiving water that receives runoff from the original construction activity.
 - 2) Locations within the same Minnesota Department of Natural Resource (DNR) catchment area as the original construction activity.
 - 3) Locations in the next adjacent DNR catchment area up-stream
 - 4) Locations anywhere within the permittee's jurisdiction.
 - b. Mitigation projects must involve the creation of new structural stormwater BMPs or the retrofit of existing structural stormwater BMPs, or the use of a properly designed regional structural stormwater BMP. ☐ Yes ☒ No
 - c. Routine maintenance of structural stormwater BMPs already required by this permit cannot be used to meet mitigation requirements of this part. ☐ Yes ☒ No
 - d. Mitigation projects shall be completed within 24 months after the start of the original construction activity. ☐ Yes ☒ No
 - e. The permittee shall determine, and document, who will be responsible for long-term maintenance on all mitigation projects of this part. ☐ Yes ☒ No
 - f. If the permittee receives payment from the owner and/or operator of a construction activity for mitigation purposes in lieu of the owner or operator of that construction activity meeting the conditions for post-construction stormwater management in Part III.D.5.a(2), the permittee shall apply any such payment received to a public stormwater project, and all projects must be in compliance with Part III.D.5.a(4)(a)-(e). ☐ Yes ☒ No
5. **Long-term maintenance of structural stormwater BMPs:** The permittee's regulatory mechanism(s) shall provide for the establishment of legal mechanisms between the permittee and owners or operators responsible for the long-term maintenance of structural stormwater BMPs not owned or operated by the permittee, that have been implemented to meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)). This only includes structural stormwater BMPs constructed after the effective date of this permit and that are directly connected to the permittee's MS4, and that are in the permittee's jurisdiction. The legal mechanism shall include provisions that, at a minimum:
- a. Allow the permittee to conduct inspections of structural stormwater BMPs not owned or operated by the permittee, perform necessary maintenance, and assess costs for those structural stormwater BMPs when the permittee determines that the owner and/or operator of that structural stormwater BMP has not conducted maintenance. ☐ Yes ☒ No
 - b. Include conditions that are designed to preserve the permittee's right to ensure maintenance responsibility, for structural stormwater BMPs not owned or operated by the permittee, when those responsibilities are legally transferred to another party. ☐ Yes ☒ No
 - c. Include conditions that are designed to protect/preserve structural stormwater BMPs and site features that are implemented to comply with the Permit (Part III.D.5.a(2)). If site configurations or structural stormwater BMPs change, causing decreased structural stormwater BMP effectiveness, new or improved structural stormwater BMPs must be implemented to ensure the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) continue to be met. ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within twelve (12) months of the date permit coverage is extended, these permit requirements are met:

B.2.a., B.2.b: Within twelve months that permit coverage is extended we will update our ordinances as necessary to include volume, total suspended solids, and total phosphorous requirements.

B.3.a.1., B.3.a.3: Within twelve months that permit coverage is extended we will review current design standards and update if necessary to include additional volume control regulations. Please note however that infiltration is generally extremely difficult in Duluth given the type D soils, shallow bedrock, and steep grade.

B.4: Within twelve months that permit coverage is extended we will revise our ordinance to include mitigation provisions to meet permit requirements.

B.5: Although we currently require owners of private BMPs to sign a maintenance agreement, within twelve months that permit coverage is extended we will review and update this process to ensure compliance with this permit requirement.

III. Enforcement Response Procedures (ERPs): (Part II.D.3)

- A. Do you have existing ERPs that satisfy the requirements of the Permit (Part III.B.)? ☐ Yes ☒ No
1. If **yes**, attach them to this form as an electronic document, with the following file naming convention: *MS4NameHere_ERPs*.
 2. If **no**, describe the tasks and corresponding schedules that will be taken to assure that, with twelve (12) months of the date permit coverage is extended, these permit requirements are met:
We currently have procedures covering:
- Emergency spills, IDDE, construction Inspections, various infrastructure inspections, record keeping documentation, etc. Within twelve months of permit coverage being extended we will update these as necessary to include escalating enforcement provisions to meet permit requirements.
- B. Describe your ERPs:
Depending on circumstances, the City has the ability to issue stop work orders, penalties, fees, and bill for clean-up costs. Violations of City ordinance is a misdemeanor and can be punished accordingly.

IV. Storm Sewer System Map and Inventory: (Part II.D.4.)

- A. Describe how you manage your storm sewer system map and inventory:
Engineering, GIS, and Operations staff are in constant communication about updates to any asset on all four utilities within the GIS system. New assets and records are added and/or updated daily.
- B. Answer **yes** or **no** to indicate whether your storm sewer system map addresses the following requirements from the Permit (Part III.C.1.a-d), as listed below:
1. The permittee's entire small MS4 as a goal, but at a minimum, all pipes 12 inches or greater in diameter, including stormwater flow direction in those pipes. ☒ Yes ☐ No
 2. Outfalls, including a unique identification (ID) number assigned by the permittee, and an associated geographic coordinate. ☒ Yes ☐ No
 3. Structural stormwater BMPs that are part of the permittee's small MS4. ☒ Yes ☐ No
 4. All receiving waters. ☒ Yes ☐ No
- If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:
- C. Answer **yes** or **no** to indicate whether you have completed the requirements of 2009 Minnesota Session Law, Ch. 172. Sec. 28: with the following inventories, according to the specifications of the Permit (Part III.C.2.a.-b.), including:
1. All ponds within the permittee's jurisdiction that are constructed and operated for purposes of water quality treatment, stormwater detention, and flood control, and that are used for the collection of stormwater via constructed conveyances. ☒ Yes ☐ No
 2. All wetlands and lakes, within the permittee's jurisdiction, that collect stormwater via constructed conveyances. ☒ Yes ☐ No
- D. Answer **yes** or **no** to indicate whether you have completed the following information for each feature inventoried.
1. A unique identification (ID) number assigned by the permittee. ☒ Yes ☐ No
 2. A geographic coordinate. ☒ Yes ☐ No
 3. Type of feature (e.g., pond, wetland, or lake). This may be determined by using best professional judgment. ☒ Yes ☐ No
- If you have answered **yes** to all above requirements, and you have already submitted the Pond Inventory Form to the MPCA, then you do not need to resubmit the inventory form below.
- If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:
- E. Answer **yes** or **no** to indicate if you are attaching your pond, wetland and lake inventory to the MPCA on the form provided on the MPCA website at: <http://www.pca.state.mn.us/ms4>, according to the ☐ Yes ☒ No

specifications of Permit (Part III.C.2.b.(1)-(3)). Attach with the following file naming convention:
MS4NameHere_inventory.

If you answered **no**, the inventory form must be submitted to the MPCA MS4 Permit Program within 12 months of the date permit coverage is extended.

V. Minimum Control Measures (MCMs) (Part II.D.5)

A. MCM1: Public education and outreach

1. The Permit requires that, within 12 months of the date permit coverage is extended, existing permittees revise their education and outreach program that focuses on illicit discharge recognition and reporting, as well as other specifically selected stormwater-related issue(s) of high priority to the permittee during this permit term. Describe your **current** educational program, including **any high-priority topics included**:

Our current education and outreach program focuses heavily on illicit discharge detection and elimination (IDDE) because of our steep grade and proximity to Lake Superior. Although the center of Duluth is very urbanized, many parts of the city have a more rural development feel with ditches and culverts, so we also focus some of our outreach toward pollution prevention in these types of areas. We also encourage public involvement in pollution prevention by sponsoring neighborhood cleanup programs in the spring, stream cleanups, and the adopt-a-catch basin program.

2. List the categories of BMPs that address your public education and outreach program, including the distribution of educational materials and a program implementation plan. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the U.S. Environmental Protection Agency's (EPA) *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Outreach	Ongoing: Distribute at least 1000 brochures/items each calendar year
Training	Ongoing: Host at least one workshop/training event per year targeting municipal field staff.
Printed Materials	Ongoing: Annually review all printed materials and update if necessary
Schools	Ongoing: Present stormwater information to at least twelve school groups each year
BMP categories to be implemented	Measurable goals and timeframes
Training	Present stormwater IDDE information to all appropriate field staff each year
Outreach	Update City stormwater website annually
Annual Evaluation	At least once annually, review all BMPs related to MCM1 and revise if necessary

3. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Program Coordinator

B. MCM2: Public participation and involvement

1. The Permit (Part III.D.2.a.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement a public participation/involvement program to solicit public input on the SWPPP. Describe your current program:

We currently host one public meeting each spring in partnership with several neighboring MS4s. We also make the SWPPP available to the public.

2. List the categories of BMPs that address your public participation/involvement program, including solicitation and documentation of public input on the SWPPP. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Annual Meeting	Host annual meeting at a convenient location, collaborate with other area MS4s to avoid duplication
Hotline	Continue 24 hour hotline program for information and reporting
Stakeholders	Maintain membership in 2-4 regional organizations
BMP categories to be implemented	Measurable goals and timeframes
SWPPP online	Make SWPPP available on the internet
Annual Evaluation	Annually review and adjust program if necessary

3. Do you have a process for receiving and documenting citizen input? ☐ Yes ☒ No

If you answered **no** to the above permit requirement, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

Within twelve months that permit coverage is extended we will update our formal, written process for receiving and considering citizen input.

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Program Coordinator

C. MCM 3: Illicit discharge detection and elimination

1. The Permit (Part III.D.3.) requires that, within 12 months of the date permit coverage is extended, existing permittees revise their current program as necessary, and continue to implement and enforce a program to detect and eliminate illicit discharges into the small MS4. Describe your current program:

Our current program focuses on aggressively inspecting for and responding to reports of illicit discharges. This also includes focused public education on properly identifying and reporting illicit discharges.

2. Does your Illicit Discharge Detection and Elimination Program meet the following requirements, as found in the Permit (Part III.D.3.c.-g.)?

- Incorporation of illicit discharge detection into all inspection and maintenance activities conducted under the Permit (Part III.D.6.e.-f.) Where feasible, illicit discharge inspections shall be conducted during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation). ☒ Yes ☐ No
- Detecting and tracking the source of illicit discharges using visual inspections. The permittee may also include use of mobile cameras, collecting and analyzing water samples, and/or other detailed procedures that may be effective investigative tools. ☒ Yes ☐ No
- Training of all field staff, in accordance with the requirements of the Permit (Part III.D.6.g.(2)), in illicit discharge recognition (including conditions which could cause illicit discharges), and reporting illicit discharges for further investigation. ☐ Yes ☒ No
- Identification of priority areas likely to have illicit discharges, including at a minimum, evaluating land use associated with business/industrial activities, areas where illicit discharges have been identified in the past, and areas with storage of large quantities of significant materials that could result in an illicit discharge. ☐ Yes ☒ No
- Procedures for the timely response to known, suspected, and reported illicit discharges. ☐ Yes ☒ No
- Procedures for investigating, locating, and eliminating the source of illicit discharges. ☐ Yes ☒ No
- Procedures for responding to spills, including emergency response procedures to prevent spills from entering the small MS4. The procedures shall also include the immediate notification of the Minnesota Department of Public Safety Duty Officer, if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. § 115.061. ☐ Yes ☒ No
- When the source of the illicit discharge is found, the permittee shall use the ERPs required by the Permit (Part III.B.) to eliminate the illicit discharge and require any needed corrective action(s). ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

C.2.c: We currently train most, but not all field staff. Within twelve months that permit coverage is extended we will implement a training schedule that ensures all appropriate field staff receive stormwater IDDE training.

C.2.d: We currently do not have a prioritization scheme based on land use, however historical issues are a factor in prioritization. Within twelve months that permit coverage is extended we will formalize a process to consider increased frequency of inspections based on land use.

C.2.e: We currently have procedures for timely response to illicit discharges, however within twelve months that permit coverage is extended we will review and update them to ensure that they meet permit requirements.

C.2.f: We currently have procedures for investigation and elimination of illicit discharges, however within twelve months that permit coverage is extended we will review and update them to ensure that they meet permit requirements.

C.2.g: We have spill response procedures but within twelve months that permit coverage is extended we will review and update them to ensure that they meet permit requirements.

C.2.h: Within twelve months that permit coverage is extended we will develop appropriate ERPs to meet permit requirements.

3. List the categories of BMPs that address your illicit discharge, detection and elimination program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s*

(<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Training	Annually train all field staff on identifying and reporting illicit discharges
Outreach	Target public education on identification and reporting of illicit discharges. Continue hotline number. Track number of calls.
Illegal Wastes	Continue work to eliminate SSO's by 2016 and continue to enforce illegal dumping (ongoing)
BMP categories to be implemented	Measurable goals and timeframes
Evaluation	Annually we will evaluate our City to identify priority sites or potential "hotspot" areas and adjust our program if necessary

4. Do you have procedures for record-keeping within your Illicit Discharge Detection and Elimination (IDDE) program as specified within the Permit (Part III.D.3.h.)? ☐ Yes ☒ No

If you answered **no**, indicate how you will develop procedures for record-keeping of your Illicit Discharge, Detection and Elimination Program, within 12 months of the date permit coverage is extended:

Within twelve months that permit coverage is extended we will revise our program to meet permit requirements.

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Program Coordinator

D. MCM 4: Construction site stormwater runoff control

1. The Permit (Part III.D.4) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a construction site stormwater runoff control program. Describe your current program:

Our current program includes an Erosion and Sediment Control ordinance which establishes requirements for such controls on construction sites. Through our outreach and education program, permitting process, as well as regular meetings with contractors the City ensures that developers are aware of the regulations and process.

The City currently inspects construction sites to review compliance.

2. Does your program address the following BMPs for construction stormwater erosion and sediment control as required in

the Permit (Part III.D.4.b.):

- a. Have you established written procedures for site plan reviews that you conduct prior to the start of construction activity? ☐ Yes ☒ No
- b. Does the site plan review procedure include notification to owners and operators proposing construction activity that they need to apply for and obtain coverage under the MPCA's general permit to *Discharge Stormwater Associated with Construction Activity No. MN R100001*? ☐ Yes ☒ No
- c. Does your program include written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public to the permittee? ☐ Yes ☒ No
- d. Have you included written procedures for the following aspects of site inspections to determine compliance with your regulatory mechanism(s):
 - 1) Does your program include procedures for identifying priority sites for inspection? ☐ Yes ☒ No
 - 2) Does your program identify a frequency at which you will conduct construction site inspections? ☐ Yes ☒ No
 - 3) Does your program identify the names of individual(s) or position titles of those responsible for conducting construction site inspections? ☐ Yes ☒ No
 - 4) Does your program include a checklist or other written means to document construction site inspections when determining compliance? ☐ Yes ☒ No
- e. Does your program document and retain construction project name, location, total acreage to be disturbed, and owner/operator information? ☒ Yes ☐ No
- f. Does your program document stormwater-related comments and/or supporting information used to determine project approval or denial? ☐ Yes ☒ No
- g. Does your program retain construction site inspection checklists or other written materials used to document site inspections? ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

D.2: Our program does most of these things already, however, within twelve months that permit coverage is extended we will develop the necessary requirements, procedures, and documentation practices to meet permit requirements.

3. List the categories of BMPs that address your construction site stormwater runoff control program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Plan Review	Review all site plans, documentation, and review of procedures annually.
Procedures	Site inspection procedures, enforcement procedures reviewed and updated annually
Ordinance	Annually review and update as needed
BMP categories to be implemented	Measurable goals and timeframes
Site prioritization	Develop criteria for review and determination of "high-priority" sites, review annually
Training and certification	Train appropriate staff in EC Sediment BMPs, require certification every three years from U of M.

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:
Project Engineer

E. MCM 5: Post-construction stormwater management

1. The Permit (Part III.D.5.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a post-construction stormwater management program. Describe your current program:

The City has established ordinances for management of post construction stormwater. Plans and Permits are submitted

to and approved by the City Engineer.

2. Have you established written procedures for site plan reviews that you will conduct prior to the start of construction activity? ☐ Yes ☒ No
3. Answer **yes** or **no** to indicate whether you have the following listed procedures for documentation of post-construction stormwater management according to the specifications of Permit (Part III.D.5.c.):
- a. Any supporting documentation that you use to determine compliance with the Permit (Part III.D.5.a), including the project name, location, owner and operator of the construction activity, any checklists used for conducting site plan reviews, and any calculations used to determine compliance? ☐ Yes ☒ No
- b. All supporting documentation associated with mitigation projects that you authorize? ☐ Yes ☒ No
- c. Payments received and used in accordance with Permit (Part III.D.5.a.(4)(f))? ☐ Yes ☒ No
- d. All legal mechanisms drafted in accordance with the Permit (Part III.D.5.a.(5)), including date(s) of the agreement(s) and names of all responsible parties involved? ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the steps that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

We currently perform most all of these tasks as part of our normal operating procedures, but not always in a formal, standardized format. Within twelve months that permit coverage is extended we will develop written procedures for these items to meet this permit requirement.

4. List the categories of BMPs that address your post-construction stormwater management program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
BMPs	Work with planning and developers to maintain a library of appropriate BMPs for this climate, review annually. Annually inspect City's existing structural BMPs.
Ordinance	Review annually, revise if appropriate.
Inventory	Maintain inventory of BMPs and structural devices, review and update at least annually
BMP categories to be implemented	Measurable goals and timeframes
Site Plan Review	Develop a more clear and consistent process to follow when reviewing plans. Complete within twelve months that permit coverage is extended, update annually thereafter.

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Project Engineer

F. MCM 6: Pollution prevention/good housekeeping for municipal operations

1. The Permit (Part III.D.6.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement an operations and maintenance program that prevents or reduces the discharge of pollutants from the permittee owned/operated facilities and operations to the small MS4. Describe your current program:

The City of Duluth is mindful of the impact that our municipal operations can have on receiving waters. We continually work to balance providing all of the necessary City services with public safety and environmental health.

In addition to the regular training that is provided to many City employees, we:

- Regularly inspect our fleet vehicles and City facilities to ensure that they are not contributing to stormwater pollution.
- Perform annual inspections of stockpiles and storage facilities

- Perform regular street sweeping program, most streets at least twice per year and additionally on an as-needed basis.
- Regular inspections of our own system to ensure compliance.

2. Do you have a facilities inventory as outlined in the Permit (Part III.D.6.a.)? ☐ Yes ☒ No
3. If you answered **no** to the above permit requirement in question 2, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

City of Duluth does have a facilities inventory which includes all buildings, parks, etc. We believe that this requirement is nearly finished already, but within twelve months that permit coverage is extended we will review and update the inventory to ensure that it is complete.

4. List the categories of BMPs that address your pollution prevention/good housekeeping for municipal operations program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. For an explanation of measurable goals, refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Vehicles	Annual inspections, washed/maintained appropriately
Hazardous	Annual training for appropriate responders. Spill response and other related procedures reviewed annually
Sweeping	Annually sweep all appropriate streets in the City
Training	Provide appropriate training to appropriate employees as needed
BMP categories to be implemented	Measurable goals and timeframes
Inspections	Annual inspection of 100% of structural sediment basins. Inspection of ponds and outfalls within permit term. Quarterly inspections of all stockpiles and material handling areas.
Training	Provide an adequate level of training to appropriate employees at least once per year. Increase number of employees receiving training.

5. Does discharge from your MS4 affect a Source Water Protection Area (Permit Part III.D.6.c.)? ☐ Yes ☒ No
- a. If **no**, continue to 6.
- b. If **yes**, the Minnesota Department of Health (MDH) is in the process of mapping the following items. Maps are available at <http://www.health.state.mn.us/divs/eh/water/swp/maps/index.htm>. Is a map including the following items available for your MS4:
- 1) Wells and source waters for drinking water supply management areas identified as vulnerable under Minn. R. 4720.5205, 4720.5210, and 4720.5330? ☐ Yes ☐ No
- 2) Source water protection areas for surface intakes identified in the source water assessments conducted by or for the Minnesota Department of Health under the federal Safe Drinking Water Act, U.S.C. §§ 300j – 13? ☐ Yes ☐ No
- c. Have you developed and implemented BMPs to protect any of the above drinking water sources? ☐ Yes ☐ No
6. Have you developed procedures and a schedule for the purpose of determining the TSS and TP treatment effectiveness of all permittee owned/operated ponds constructed and used for the collection and treatment of stormwater, according to the Permit (Part III.D.6.d.)? ☐ Yes ☒ No
7. Do you have inspection procedures that meet the requirements of the Permit (Part III.D.6.e.(1)-(3)) for structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material ☐ Yes ☒ No

handling areas?

8. Have you developed and implemented a stormwater management training program commensurate with each employee's job duties that:
- a. Addresses the importance of protecting water quality? ☒ Yes ☐ No
 - b. Covers the requirements of the permit relevant to the duties of the employee? ☒ Yes ☐ No
 - c. Includes a schedule that establishes initial training for new and/or seasonal employees and recurring training intervals for existing employees to address changes in procedures, practices, techniques, or requirements? ☐ Yes ☒ No
9. Do you keep documentation of inspections, maintenance, and training as required by the Permit (Part III.D.6.h.(1)-(5))? ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements listed in **Questions 5 – 9**, then describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

Within twelve months that permit coverage is extended we will develop procedures and processes to meet requirements of #6

Within twelve months that permit coverage is extended we will update our procedures to meet the requirements of #7

Although we do track and document most of these items in #8 within twelve months that permit coverage is extended we will update our program to meet these requirements

Within twelve months that permit coverage is extended we will update our procedures and documentation practices to meet the requirements of #9

10. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Program Coordinator

VI. Compliance Schedule for an Approved Total Maximum Daily Load (TMDL) with an Applicable Waste Load Allocation (WLA) (Part II.D.6.)

- A. Do you have an approved TMDL with a Waste Load Allocation (WLA) prior to the effective date of the Permit? ☐ Yes ☒ No
- 1. If **no**, continue to section VII.
 - 2. If **yes**, fill out and attach the MS4 Permit TMDL Attachment Spreadsheet with the following naming convention: *MS4NameHere_TMDL*.

This form is found on the MPCA MS4 website: <http://www.pca.state.mn.us/ms4>.

VII. Alum or Ferric Chloride Phosphorus Treatment Systems (Part II.D.7.)

- A. Do you own and/or operate any Alum or Ferric Chloride Phosphorus Treatment Systems which are regulated by this Permit (Part III.F.)? ☐ Yes ☒ No
- 1. If **no**, this section requires no further information.
 - 2. If **yes**, you own and/or operate an Alum or Ferric Chloride Phosphorus Treatment System within your small MS4, then you must submit the Alum or Ferric Chloride Phosphorus Treatment Systems Form supplement to this document, with the following naming convention: *MS4NameHere_TreatmentSystem*.

This form is found on the MPCA MS4 website: <http://www.pca.state.mn.us/ms4>.

VIII. Add any Additional Comments to Describe Your Program



MEMORANDUM OF UNDERSTANDING to establish a REGIONAL STORMWATER PROTECTION TEAM

A. INTRODUCTION

This Memorandum of Understanding (MOU) formalizes coordination of the Regional Stormwater Protection Team (RSPT), an information networking task force of agencies and jurisdictions including, but not limited to the signatory entities listed on page three.

The RSPT mission is to protect and enhance the region's shared water resources through stormwater pollution prevention by providing coordinated educational programs and technical assistance. Team members are committed to preventing and resolving issues of mutual concern for environmental protection on a regional watershed scale. This commitment is reinforced by policies internal to each agency. To sustain long-term commitment, the signatories agree to establish and implement the Interagency Stormwater Pollution Prevention Initiative described herein.

The goals of this initiative are to foster stormwater pollution prevention as the preferred environmental protection strategy within local and state agencies and to support and promote similar efforts within the private sector and at the community level. Benefits of working together include offering a focal point for pollution prevention, reducing expenses by sharing knowledge and resources, minimizing duplication of effort and increasing grant application success, all of which will help significantly enhance the protection of Lake Superior, the Duluth-Superior Harbor and all their tributaries.

In the spirit of these objectives, the agencies represented by the signatories on this document agree to maintain a cooperative working relationship to promote stormwater pollution prevention.

This MOU does not create enforceable legal obligations, but rather is an expression of intent by the signatories to work with one another as partners to reduce stormwater pollution.

Nothing in this agreement is intended, nor shall it act in any way to alter, impede, or interfere with the authorities and procedures of the agencies involved in carrying out their regulatory and law enforcement responsibilities or their individual missions.

B. PURPOSE

Through this document, the members of the Regional Stormwater Protection Team establish a common agenda to work together on pollution prevention objectives and specific goals in a cost effective and consistent manner. Successful implementation of this collaboration effort will help to:

- Incorporate stormwater pollution prevention measures into local jurisdiction and agency programs and planning;



- Avoid a piecemeal approach to stormwater pollution prevention and program development;
- Share resources for stormwater pollution prevention projects;
- Enhance efficiency in the delivery of prevention services;
- Provide consistent regional environmental messages;
- Improve communication and interrelationships between agencies and local jurisdictions;
- Support existing agency missions and partnership agreements;
- Reduce stormwater peak flows and pollutant loads within the Western Lake Superior Watershed.

C. AREAS OF AGREEMENT:

The signatories agree to promote stormwater pollution prevention and pursue issues of mutual concern. In particular, the parties will strive to:

1. Seek opportunities to collaborate on stormwater pollution prevention projects of mutual interest, to demonstrate pollution prevention technologies and techniques.
 - a) Stage periodic environmental show and tell events,
 - b) Develop educational materials and co-sponsor workshops focused toward specific audiences,
 - c) Develop an information clearinghouse,
 - d) Identify areas where policies conflict and may need to be revised to achieve goals,
 - e) Develop collaborative grant proposals.
2. Share, exchange and learn stormwater pollution prevention technologies and techniques through periodic meetings and joint training programs.
 - a) Share strategies and progress in implementation,
 - b) Provide relevant technology updates,
 - c) Participate in environmental roundtable discussions,
 - d) Share innovative ideas.
3. Demonstrate watershed-wide environmental leadership in stormwater pollution prevention.
 - a) Promote stormwater pollution prevention through press releases and other interpretive programs conducted by participating agencies,
 - b) Enhance watershed-wide efforts to increase communications and education about the importance of stormwater pollution prevention.
4. Seek opportunities to eliminate or reduce stormwater pollution and encourage use of efficient pollution prevention technologies and techniques.
 - a) Identify root causes of stormwater pollution and take steps to reduce or eliminate wastes through stormwater pollution prevention techniques,
 - b) Identify and overcome barriers to adoption of stormwater pollution prevention practices,
 - c) Educate the general citizenry about stormwater pollution prevention through formal and informal education.
5. Cooperate in evaluating stormwater pollution prevention.
 - a) Evaluate needs and goals of participating agencies,
 - b) Determine what information is required to meet goals and needs,



- c) Measure progress in reducing stormwater pollution.
6. Develop and demonstrate environmentally benign and beneficial alternatives to current non-sustainable practices.

D. ORGANIZATION STRUCTURE (see Attachment A)

Each participant shall designate at least one contact to monitor pollution prevention coordination activities within their singular jurisdiction. These individuals shall provide input to the RSPT on the initiative. The RSPT will oversee the development and implementation of the interagency initiative to facilitate communication and coordination on stormwater pollution prevention.

The RSPT meets regularly. All ideas are encouraged and welcome. Appropriate projects, workgroup formations, and courses of action are determined by a consensus of the members.

E. CHANGES TO THE AGREEMENT:

Amendments or additional appendices may be developed and implemented by mutual written agreement of the signatories at any time without renegotiating the entire MOU. A party may also terminate its participation in this agreement after providing 30 days written notice to the other parties.

F. EFFECTIVE DATE OF AGREEMENT:

This agreement is effective April 1, 2004 and will remain in effect for all parties unless and until they choose to formally terminate.

G. SIGNATORIES

_____ Herb Bergson, Mayor	_____ City of Duluth	_____ Date
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_____ Richard Kieren, Mayor	_____ City of Proctor	_____ Date
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_____ David Allen, Mayor	_____ City of Hermantown	_____ Date
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_____ Dave Ross, Mayor	_____ City of Superior	_____ Date
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Marcus Hall,
Public Works Director

St. Louis County

Date

George Sundstrom,
Chairperson

Duluth Township

Date

Earl Elde,
Chairperson

Midway Township

Date

George Andrews,
Chairperson

Rice Lake Township

Date

Todd Campbell,
District Hydraulics Engineer

MN Dept. of Transportation

Date

Suzanne Hanson,
Duluth Manager

Minnesota Pollution Control Agency

Date

Sue O'Halloran,
Water Quality Specialist

Lake Superior Research Institute
University of WI, Superior

Date

Greg Fox,
Vice Chancellor Finance & Operations

University of MN-Duluth

Date

R.C. Boheim,
Manager

South St. Louis Soil and Water
Conservation District

Date



Kurt N.W. Soderberg, Western Lake Superior Sanitary Dist.
Executive Director

Date

Robert B. Peacock, Fond du Lac Reservation Business
Chairman Committee

Date

Carl Richards, University of MN Sea Grant
Director

Date

Lucinda Johnson, Center for Water and the Environment
Associate Director Natural Resources Research Institute
University of Minnesota-Duluth

Date

Duane Lahti Wisconsin Department of Natural
Resources

Date

Lynelle Hanson St. Louis River Citizens Action
Committee

Date



Attachment A

BY-LAWS

Regional Stormwater Protection Team Operational Structure

The Regional Stormwater Protection Team shall work in the following areas:

- I. Data collection and analysis
 - A. Develop and maintain regional audiences' mailing lists and list of groups, organizations and trade associations.
 - B. Develop and maintain a measurement system that analysis and assays outreach and communication efforts.
- II. Outreach
 - A. Develop a joint stormwater pollution prevention message and share it with companies, organizations, associations and the general citizenry.
 - B. Develop and maintain educational materials to achieve awareness and compliance on a cooperative basis from citizens and businesses.
- III. Communication
 - A. Meet monthly to discuss stormwater pollution prevention issues facing the region.
 - B. Communicate status of local, regional, state or national activities.
 - C. Communicate on the status of specific regulatory decisions to the extent such decisions affect development of a regional stormwater pollution prevention management system.
 - D. Develop technical assistance roundtable discussion groups.
 - E. Share information about current and planned written materials.
 - F. Develop additional relationships with related groups and organizations.
- IV. Organization
 - A. Chairperson: This position will serve no less than 12 months and is responsible for organizing and leading meetings.
 - B. Vice Chair: This position will serve no less than 12 months and will prepare to serve as chair for the following 12 months.
 - C. Fiscal Agents: Fiscal Agents identified in each successful grant application will prepare and present periodic fiscal statements to the Team.
finances.
 - D. Note taker: This position will serve on a monthly basis and is responsible for keeping and distributing meeting minutes.